

SETTLEMENT DATE AND TIME: October 23, 2015 at 12:00 noon (Eastern time)

OBJECTION DATE AND TIME: October 23, 2015 at 11:30 a.m. (Eastern time)

GIBSON DUNN & CRUTCHER LLP

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*Attorneys for the Motors Liquidation
Company GUC Trust Administrator*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**MOTORS LIQUIDATION COMPANY, *et*
al., f/k/a General Motors Corp., *et al.*,**

Debtors.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

**NOTICE OF SETTLEMENT OF
ORDER ON BENCH DECISION AND ORDER ON REQUEST FOR STAY**

PLEASE TAKE NOTICE that, pursuant to Rule 9074-1 of the Local Rules of Bankruptcy Procedure for the Southern District of New York and this Court's *Bench Decision and Order on Request for Stay*, dated October 14, 2015 [ECF No. 13503, Ex. A], the [Proposed] Order on Bench Decision and Order on Request for Stay will be presented for signature and entry to the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 523 of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 on **October 23, 2015 at 12:00 noon (Eastern Time).**

PLEASE TAKE FURTHER NOTICE that objections or proposed counter-orders must be made in writing and shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, NY 10166- 0193 (Attn: Lisa H. Rubin, Esq.); (ii) Brown Rudnick LLP, Seven Times Square, New York, NY 10036 (Attn: Edward S. Weisfelner, Esq.); (iii) Stutzman, Bromberg, Esserman & Plifka, P.C., 2323 Bryan Street, Suite 2200, Dallas, TX 75201 (Attn: Sander L. Esserman, Esq.); (iv) Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: Daniel H. Golden, Esq.); (v) Goodwin Proctor LLP, The New York Times Building, 620 Eighth Avenue, New York, NY 10018 (Attn: William P. Weintraub, Esq.); and (vi) King & Spalding LLP, 1185 Avenue of the Americas, New York, New York 10036 (Attn: Arthur Steinberg, Esq.), so as to be received no later than **October 23, 2015, at 11:30 a.m. (Eastern Time)**.

Dated: New York, New York
October 21, 2015

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Lisa H. Rubin

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**MOTORS LIQUIDATION COMPANY, *et al.*,
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Debtors.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

**[PROPOSED] ORDER ON BENCH DECISION AND ORDER ON REQUEST FOR
STAY**

For the reasons stated in this Court's *Bench Decision and Order on Request for Stay*, dated October 14, 2015 [ECF No. 13503, Ex. A], **IT IS HEREBY:**¹

ORDERED that Plaintiffs' Request for a Stay of GUC Trust Distributions, dated June 24, 2015 [ECF No. 13246], is granted with respect to the Anticipated November 2015 Distribution and conditioned on the posting of a supersedeas bond in the amount of \$10.6 million; and it is further

ORDERED that should Plaintiffs elect to post the supersedeas bond, they must do so by the close of business on October 28, 2015, and certify the same to this Court.

Dated: New York, New York
October __, 2015

Honorable Robert E. Gerber
United States Bankruptcy Judge

¹ Unless otherwise noted herein, capitalized terms have the same meaning as in the *Stipulations of Fact*, dated September 17, 2015 [ECF No. 13441].